

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE ETHICON, INC.**

**PELVIC REPAIR SYSTEM PRODUCTS**

**LIABILITY**

**CIVIL ACTION NO. 2:12-md-02327**

**LITIGATION MDL No. 2327**

**Hon. Judge Joseph R. Goodwin**

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**This document applies to:**

Betty Adams v. Ethicon, Inc., et al.

2:17-cv-01131

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR ORDER REGARDING  
DISPOSITION OF NON-REVISION GYNECARE TVT PRODUCT CASES**

NOW COME the above-referenced Plaintiff, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson ("Ethicon") regarding the disposition of non-revision Gynecare TVT Products Cases (ECF Doc. 5313) set forth the following:

On March 2, 2018, Ethicon filed *Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (ECF Doc. 5313), which proposes a disposition of cases in which the plaintiff has not undergone a revision procedure. Accompanying the motion as Exhibit A is a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named plaintiff is included in Ethicon's list of plaintiffs who have not undergone a revision procedure. The above-named plaintiff has in fact undergone a revision procedure and is not properly included in Ethicon's motion. Plaintiff's counsel has informed Ethicon that the above-named

plaintiff is not properly included in Defendants' motion pertaining to non-revision cases. Plaintiff files this response to preserve her claims and avoid dismissal to the extent that Ethicon's motion is granted.

Respectfully submitted,

By: /s/ Seth S. Webb

**SETH S. WEBB # 51236**

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 4, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

Respectfully submitted,

By: /s/ Seth S. Webb

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